

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA**

FARHAD AZIMA,

Plaintiff,

v.

Case No. 20-CV-954-WO-JLW

NICHOLAS DEL ROSSO and VITAL
MANAGEMENT SERVICES, INC.,

Defendants.

**NON-PARTY GLOBAL IMPACT SERVICES, LLC’S UNOPPOSED MOTION
FOR LIMITED LIFT OF STAY AND TO MODIFY PROTECTIVE ORDER
(DOCKET 177)**

COMES NOW, non-party, Global Impact Services, LLC (“Global Impact”), pursuant to Fed. R. Civ. P. 26(c) and Rule 26.2 of the Civil Rules of Practice and Procedure for the United States District Court for the Middle District of North Carolina, and files this motion for a limited lift of the stay (Dkt. 282) and to modify the Protective Order (Dkt. 177) previously entered in this case. Global Impact seeks this relief for the purpose of clarifying that non-parties whose bank records have been produced in this action pursuant to a subpoena issued to a non-party bank may seek protection of such documents in the same manner as a “Producing Party” as defined in the Protective Order (*id.* § 2).

In support of this motion Global Impact submits as Exhibit A, a copy of the subpoena *duces tecum* issued to Truist Bank in this action which seeks records concerning accounts held by Global Impact. Global Impact also submits a supporting memorandum of law.

Undersigned counsel certifies that he has conferred with Counsel for Plaintiff and Defendants and they do not object to the relief being sought herein.

Because none of the parties to the action object to the relief being requested herein, undersigned counsel also respectfully requests to be excused from the status conference currently set for September 29, 2023 (*See* Dkt. 282).

WHEREFORE, Global Impact respectfully requests that the Court lift the stay presently in effect for the limited purpose of entering an Order modifying the Protective Order at Docket 177 to allow non-party, bank account holders whose bank records are produced by non-party banks in this litigation in response to third-party subpoenas to have the same status as a “Producing Party” under the Protective Order. And that the Court further excuse undersigned counsel from attendance at the September 29, 2023 status conference to the extent its Order at Docket 282 were intended to apply to undersigned counsel.

Dated this 21st day of September, 2023

Respectfully submitted,

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